

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 1:18-CR-83

GOVERNMENT'S MOTION FOR ENTRY OF DISCOVERY ORDER

The United States of America, by and through Special Counsel Robert S. Mueller, III, respectfully moves the Court for an Order regulating the schedule of discovery in the above-captioned matter. A proposed order, which conforms to the standard discovery order typically used in this district, is attached to this filing.

On February 22, 2018, a federal grand jury sitting in the Eastern District of Virginia returned a Superseding Indictment against Paul J. Manafort, Jr. and Richard W. Gates III. The Superseding Indictment charges Manafort with subscribing to false income tax returns, in violation of 26 U.S.C. § 7206(1) (Counts 1-5); failing to file reports of foreign bank accounts, in violation of 31 U.S.C. §§ 5314, 5322(a) (Counts 11-14); and bank fraud conspiracy and bank fraud, in violation of 18 U.S.C. §§ 1344, 1349 (Counts 24-32).

The defendant was arraigned on March 8, 2018, and he entered pleas of not guilty to each count of the Superseding Indictment. Prior to the arraignment, on February 27, 2018, the government proposed the attached discovery order to defense counsel. The proposed order tracks the schedule and deadlines in this district's standard discovery order. As the Court is aware, in addition to a schedule for Rule 16 discovery, the standard discovery order also sets forth deadlines

for 404(b), *Brady*, *Giglio*, and Jencks material as well as notices for experts, alibis, and stipulations.

The defendant has already received robust discovery in this case and in the parallel District of Columbia prosecution. Indeed, the government has cumulatively made 19 separate productions – each containing a detailed index – in both cases. However, since February 2018 and as recently as last week, the government has been unable to obtain Manafort's position on the attached proposed discovery order. Accordingly, in order to adequately prepare for trial, reduce discovery litigation, and protect additional materials to be produced in this case, the government respectfully asks this Court to enter the attached proposed discovery order.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

Dated: June 11, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of June, 2018, I will cause to be filed electronically the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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